

# EXHIBIT B

NEW YORK  
LONDON  
SINGAPORE  
PHILADELPHIA  
CHICAGO  
WASHINGTON, DC  
SAN FRANCISCO  
SILICON VALLEY  
SAN DIEGO  
LOS ANGELES  
BOSTON  
HOUSTON  
DALLAS  
AUSTIN  
HANOI  
HO CHI MINH CITY

**DuaneMorris®**

*FIRM and AFFILIATE OFFICES*

JESSICA PRISELAC  
DIRECT DIAL: +1 215 979 1159  
PERSONAL FAX: +1 215 827 5486  
E-MAIL: JPriselac@duanemorris.com

[www.duanemorris.com](http://www.duanemorris.com)

SHANGHAI  
ATLANTA  
BALTIMORE  
WILMINGTON  
MIAMI  
BOCA RATON  
PITTSBURGH  
NEWARK  
LAS VEGAS  
CHERRY HILL  
LAKE TAHOE  
MYANMAR  
  
ALLIANCES IN MEXICO  
AND SRI LANKA

January 19, 2022

**VIA E-MAIL**

**RESTRICTED CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

Adam M. Slater, Esquire  
Mazie Slater Katz & Freeman, LLC  
103 Eisenhower Parkway  
Roseland, NJ 07068

**Re: In re Valsartan, Losartan, and Irbesartan Products Liability Litigation**  
**Case No. 1:19-md-02875-RBK-JS**

Counsel:

ZHP remains unsuccessful in obtaining the permission of the government of the People’s Republic of China (“PRC”), pursuant to the PRC’s Data Security Law, to export documents located in China that the Court has ordered to be produced. Despite the penalties that might be imposed under Chinese law (as set forth in ZHP’s prior briefing on these issues, which ZHP incorporates by reference), ZHP will be producing the documents that are the subject of Special Master Order No. 54. Please note, however, that although ZHP is in the process of producing those documents, it cannot predict whether the PRC government will intervene to stop their export; accordingly, such production is subject to that possibility.

The documents that are the subject of Plaintiffs’ pending motion for sanctions are among those that ZHP is in the process of exporting, and will be produced on a rolling basis. Accordingly, we request that Plaintiffs withdraw that portion of the motion that relates to ZHP’s document production.

Very truly yours,

*Jessica Priselac*

Jessica Priselac

DuaneMorris

January 19, 2022

Page 2

cc: Seth A. Goldberg (*via email*)  
Rachel M. Good (*via email*)  
Plaintiffs' Executive Committee (*via email*)